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April 10, 2006

National Organics Standards Board
C/O Arthur Neal
Room 4008 South Building
1400 Independence Avenue SW
Washington, DC 20250

Re: Final Report by the Aquaculture Working Group of the NOSB

Dear Mr. Neal,

I am a supporter of option A as it pertains to Fish Meal. Fish Meal is a very important component in the diets of Aquacultured Fish. It is a highly digestible protein with the essential amino acid profile, which is important for the growth of the Fish. The Omega 3 fatty acid profile of DHA/EPA is also another important attribute in fishmeal that is passed along to the fish. To take this out of the diet to only be replaced by synthetic amino acids would not make sense.

I do believe that Fish Meal would need to be naturally preserved in order for it to be considered organic. If the N.O.P. is going to consider a certifying company to classify a fishery or fish meal as sustainable the N.O.P. should write those standards and definitions as to what is sustainable, and not just follow the standards set by Marine Stewardship. This would make it possible for other certifying company's to be involved, and not create a monopoly for the Marine Stewardship Council. The best possible scenario would be a government organization certifying these fisheries and fish meal plants to be sustainable opposed to a private company. This would hopefully make it possible for the smaller fishing/fish meal companies that are not able to afford the fees of the previously named company to get certified.

Sincerely,

Jeff Shaffer
The Scoular Company.